

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MICHAEL COREY JENKINS, et al.

PLAINTIFFS

v.

CAUSE NO. 3:23cv374-DPJ-ASH

RANKIN COUNTY, MISSISSIPPI, et al.

DEFENDANTS

**MOTION FOR LEAVE TO DEPOSE CHRISTOPHER MACK
PURSUANT TO FED. R. CIV. P. 30(a)**

NOW COMES Defendant, Sheriff Bryan Bailey, by and through counsel, and moves this Court for leave to depose Christopher Mack, pursuant to Fed. R. Civ. P. 30(a)(2)(B), by stating as follows:

1. Defendant desires to take the deposition of Christopher Mack, an individual listed by Plaintiffs as a witness and/or potential witness related to this Defendant's qualified immunity defense and who is currently at the Central Mississippi Correctional Facility located in Pearl, Mississippi.

2. Pursuant to Fed. R. Civ. P. 30(a)(2)(B), "[a] party must obtain leave of court, and the court must grant leave to the extent consistent with Rule 26(b)(1) and (2) ... if the deponent is confined in prison." *Id.*

3. Accordingly, Defendant respectfully requests leave of this Court to depose Christopher Mack, a person confined in prison.

4. The purpose of the deposition is for qualified immunity related discovery and will occur on or prior to the discovery deadline set by this Court.

5. Pursuant to L.U. Civ. R. 7(b)(10), the undersigned counsel has discussed the instant motion with Plaintiffs' counsel and upon best information and belief, there will be no opposition to the instant motion.

6. Due to the simple and straightforward nature of the instant motion, Defendant requests to be relieved of any obligation to file an accompanying memorandum of authorities.

WHEREFORE, PREMISES CONSIDERED, Sheriff Bryan Baily prays that this Court grant him leave to take the deposition of Christopher Mack.

DATED, this 4th day of November, 2024.

SHERIFF BRYAN BAILEY - DEFENDANT

BY: /s/ Jason E. Dare
JASON E. DARE

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